

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

FILED

JAN 18 2018

ANDREW L. SAWYERS  
Plaintiff

CARMELITA R. EDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKL.  
BY RM DEPUT

v

Case no: CIV-17-52-HE

CHRIS WEST et, al,

MOTION TO COMPEL

Comes now, the Plaintiff Andrew L. Sawyers  
prose, pursuant to Fed. R. of CIV. P. Rule 26  
and asks this Honorable Court to compel Defendant  
CHRIS West et, al to produce the following documents  
Plaintiff requested in discovery: Production of  
documents.

Request For Production No. 2: Plaintiff  
requested the Defendants to produce all documents  
that refer to all lawsuits, complaints, settlements  
or alternative dispute resolutions against CDOC and  
Canadian County in the past 10 years.

The Defendant objecting, answering in part  
with one lawsuit filed in the past 5 years, The  
Plaintiff asks this Court to compel Defendants to  
provide the information requested for 10 years.

Request For Production No. 3: Plaintiff requested  
the medical file which accompanied him via  
OBN Agent Anthony Moore, from the staff  
at OU Medical Center

The Defendant objecting, answering this  
medical file only contained a request for a  
follow-up visit.



The Plaintiff asks this Court to compel Defendants Chris West et, al to produce the medical file from O.U. Medical Center which arrived at CEPC with Plaintiff on 25 Feb 2016.

Request For Production No. 5: The Plaintiff requesting documents for staffing records on 14 March 2016 to include all CEPC and Sheriff's deputies on shift 6:00 am - 4:00 pm.

The Defendants objecting stated these items are being retrieved and will supplement accordingly. Plaintiff asks this Court to compel Defendants to produce these records. Considering the Defendants excuse for not taking Plaintiff to O.U. for follow-up exam, lacking sufficient staff and it has been 7 weeks since Plaintiff received Defendants response. The Defendant given its resources has had ample time to produce these records.

Request For Production No. 10: Plaintiff requested staffing records of all CEPC and Sheriff deputies on duty 21st March 2016 (6am - 4pm).

The Defendant objecting, stating these items are being retrieved and will supplement accordingly. Plaintiff asks this Court to compel Defendants to produce these records. The 21st March 2016 was Plaintiff's 2nd scheduled follow-up appointment. Defendant, given its resources has had ample time to produce these records.

Request For Production No. 11. Plaintiff requested records showing times Lt. Carmack was present at CEPC 30th March 2016. Defendant, objecting stated these items



are being retrieved and will supplement accordingly. Plaintiff asks this Court to compel Defendant to produce these records. The Defendant has resources and ample time to produce these records.

Request For Production No. 12: Plaintiff requested maintenance logs/policies for the video monitoring equipment specifically isolation cell I-15.

Defendant, objecting stating these items are being retrieved and will supplement accordingly, Plaintiff asks this Court to compel Defendant produce these records. Defendant claims Plaintiff was under 24 hour monitoring in case of medical emergency. The Defendant having resources has had ample time to produce these records.

Request For Production No. 13: Plaintiff requested all video, audio and/or other recordings, photographic depictions of Isolation cell I-15 on 01 April 2016.

Defendant objecting stating these items are being retrieved and will supplement accordingly. Plaintiff asks this Court to compel Defendant to produce these recordings at trial. These recordings will show Plaintiff removing his own dressing, O.U. applied after surgery 5 weeks earlier. This evidence will help Plaintiff establish a pattern of conduct of negligent acts by CDC staff and Sheriff's deputies.

Request For Production No. 15: Plaintiff requested transport records for 04 April 2016 from CDC to Pottawatomie County Jail.

Defendant objecting stating these items are being retrieved and will supplement accordingly. Plaintiff asks this Court to compel Defendant



to produce these records at trial. Defendant states on numerous occasions Plaintiff was housed at CCDC until 14 April 2016 which is untrue. This evidence will help Plaintiff demonstrate Defendants facts are in error.

Wherefore, the Plaintiff prays this Honorable Court grant his motion to compel Defendant to produce the aforementioned documents to Plaintiff and others at trial for Plaintiff cannot possess such items due to his imprisonments.

Respectfully submitted,  
Andrew L. Sawyer  
Andrew L. Sawyer #738807  
Lawton Community Corrections Center  
605 S.W. Coombs Rd  
Lawton, OK 73501

#### Certificate of SERVICE

I hereby certify that a true and correct copy of the foregoing motion has been given to prison officials for mailing with pre-paid postage by U.S. Postal Service on the 15<sup>th</sup> day of January 2018 to:

Stephen L. Gerics  
Collins, Zorn & Wagner  
429 N.E. 50<sup>th</sup> St. 2nd Fl.  
Oklahoma City, OK 73105